

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

FLORENCE DIVISION

John Christopher Smith,)	C/A No.:
)	
Plaintiff,)	
v.)	ANSWERS TO LOCAL RULE
)	26.01 INTERROGATORIES
Ernest J. Edwards, individually,)	
Bobby Paul Edwards, individually, and)	
Half Moon Foods, Inc., d/b/a J&J Cafeteria,)	
)	
Defendants.)	
_____)	

Pursuant to Rule 26.01 of the Local Civil Rules for the United States District Court,
District of South Carolina, Plaintiff answers as follows:

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER: None known to Plaintiff at this time.

B. As to each claim, state whether it should be tried by jury or nonjury and why.

ANSWER: Plaintiff asserts that each claim alleged should be tried by a jury.

C. State whether the party submitting these responses is a publicly-owned company and separately identify: (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER: Plaintiff is not a publicly owned company.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civ. Rule 3.01 (D.S.C.).

ANSWER: Plaintiff is a resident and citizen of Horry County, South Carolina, and the Defendant is a resident and citizen of Horry County, South Carolina. Defendant's actions that led to Plaintiff's claims occurred in Horry County,

South Carolina. Accordingly, the Florence Division is the appropriate division of the United States District Court District of South Carolina in which to file Plaintiff's claim.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: This matter is not related to any other matter filed in the District Court, District of South Carolina.

Respectfully submitted,

McLEOD LAW GROUP, LLC
Post Office Box 21624
Charleston, South Carolina 29413
(843) 277-6655

/s/ W. Mullins McLeod, Jr.

W. Mullins McLeod, Jr., No. 7142
Michael Thoams Cooper, No. 12198
D. Ellis Roberts, No. 11467

DAVID AYLOR LAW OFFICES
24 Broad Street
Charleston, SC 29401

/s/ David Aylor

David Aylor, No. 10343

November 16, 2015
Charleston, South Carolina